

April 29, 2016

To: MLH  
From: KS

Subject: Notice of Non-Compliance (NON) 3627 Gordon Goodell

On April 25, 2016, at 1143 hours, LRAPA received an anonymous complaint regarding the demolition of a mobile home located in space #31 of the Bella Casa manufactured home park at 85961 Edenvale Road in Pleasant Hill. The complainant was concerned that the home was being demolished without an asbestos survey. KE and CW investigated the complaint on the same day and were presented with a survey indicating the absence of asbestos in the demolition debris.

On April 28, at approximately 1720 hours, LRAPA received a phone call from Chad Ficek, Lane County Waste Management, notifying the agency that a load of demolition debris originating from a burned mobile home had been transported to the Lane County Short Mountain Landfill and he was concerned about the associated survey. The survey listed Lodge Environmental Inc. as the accredited asbestos inspector and company performing/compiling the report. LRAPA discussed the survey report with staff from Lodge, and it was determined that the survey presented to LRAPA and Lane County staff had been altered from the original report. The original report compiled by Lodge indicated the presence of 5% chrysotile asbestos in the window putty and 8% chrysotile asbestos in the paint on the roof. The altered report presented to LRAPA staff on April 25 and Lane County staff on April 28 indicated an absence of asbestos in all sampled materials. Lane County staff turned away the hauler of the demolition debris, (b) (6), on April 28. Lodge provided LRAPA with the full report and estimate for abatement for the mobile home.

At 0830 hours on April 29 Colleen Wagstaff, Katie Eagleson, and I inspected the demolition site at space #31 at 85961 Edenvale Road. The mobile home was partially dismantled, with components of the roofing and widows still present and other materials strewn about in a disorganized manner. No demolition staff was present onsite at the time. A neighbor at (b) (6) provided us with the name of the original owner of the mobile home, (b) (6), and his contact information. (b) (6) had relocated to a fifth wheel trailer in (b) (6) in the mobile home park. We collected 9 samples at the demolition site for laboratory analysis. NW Hazmat analyzed the samples; results indicated the presence of asbestos in each of two samples of roofing material (5% and 3%), as well as each of two samples of window putty (30% and 25%). One sample of each materials found to be positive for asbestos was sent out by NW Hazmat for TEM analysis.

We were approached onsite by the Bella Casa mobile home park manager, (b) (6). She confirmed that (b) (6) was the original owner of the mobile home at Space #31 and explained that the unit burned down when the wood stove started a fire on the inside. She explained that Gordon Goodell had a contract with (b) (6) to demolish and dispose of the burned mobile home. She claimed that Mr. Goodell had managed the demolition project at Space #31, with other parties physically performing the demolition and hauling debris, and that she and other residents were concerned about the demolition process and associated health effects, as several residents in the vicinity have respiratory issues.

We then visited (b) (6) at his new location at (b) (6). Another resident, named (b) (6) resided with him in the unit. We requested a copy of the contract between (b) (6) and (b) (6), along

with the original asbestos survey. (b) (6) was unable to locate the contract for the mobile home demolition; he claimed that the manager, (b) (6), had a copy. He did offer some contact information related to the business owned by Mr. Goodell.

At 1005 hours on April 29 Ms. Wagstaff, Ms. Eagleson, and I visited another mobile home owned by Mr. Goodell which was awaiting abatement. The home, located at (b) (6) in the Riverwood Mobile Home Park, (b) (6) in Creswell, appeared to be intact. No efforts to demolish the home were apparent.

At 1100 hours on April 29 Ms. Wagstaff Ms. Eagleson, and I visited the Lane County Transfer Station to discuss the incident with Don Strunk, supervisor of the Waste Management Division at Lane County. Mr. Strunk provided LRAPA with photographs of the altered survey that the hauler for Mr. Goodell had presented at the landfill gate on April 28 as the hauler attempted to dispose of the demolition debris as conventional waste. Mr. Strunk explained that the hauler was (b) (6), and that (b) (6) had been operating throughout the demolition process with the mistaken knowledge that the demolition debris had been negative for asbestos. (b) (6) had provided him with an altered survey, listing all materials as negative for asbestos. With this knowledge, (b) (6) had proceeded with the demolition, with his children assisting him, without implementing the required asbestos removal practices and procedures to protect himself and those around him. Mr. Strunk explained that, due to the fact that Mr. Goodell was fully aware that he was breaking the law, this should be a criminal investigation. Mr. Strunk provided us with the home address of (b) (6); (b) (6) Lathum Road, Cottage Grove.

At 1105 hours on April 29 I called (b) (6) to discuss his involvement in the demolition and hauling of debris from the contaminated site. He confirmed that he had no knowledge of the presence of asbestos in the materials and asked what should be done with his truck, which he claimed was filled with demolition debris originating from the mobile home, including windows and roofing material. I explained that these materials must be contained in the truck and properly abated through a licensed asbestos abatement contractor. He agreed to allow us on his property to inspect his truck.

At 1121 hours on April 29 (b) (6) called and requested a copy of the original asbestos survey for the demolition site at Space #31. I emailed her a copy on the same day. She also said that she suspected (b) (6) had delivered loads of demolition debris to transfer sites in Cottage Grove and Glenwood; I called LC staff, who explained they had no record of this. (b) (6) also left a voice message claiming that Mr. Goodell suggested he falsified the asbestos survey; I have saved this voicemail.

At 1135 hours on April 29 we arrived at the home of (b) (6), at (b) (6) Lathum Road in Cottage Grove. We spoke with (b) (6) onsite. He claimed to be very upset that he and his children were unknowingly exposed to asbestos during the demolition process. He also was upset that he unknowingly acquired a truckload of contaminated building debris that will require abatement and will prevent him from using his truck, upon which he depends for income. We confirmed that roofing material was present in the truck and explained that materials should be wetted and contained until an abatement company can properly remove them. (b) (6) admitted that he took three loads of demolition debris to the Rattlesnake Road transfer station. He also alleged that a portion of the metal materials from the demolition site were hauled away from a gentleman he had sourced from Craigslist, (b) (6). He presumed that (b) (6) had taken the metal to Schnitzer's Steel.

At 1215 hours on April 29 we visited (b) (6) at the Riverwood Mobile Home Park, as this location was listed in the asbestos survey Mr. Goodell had used to alter his survey for the Edenvale Rd. site. The mobile home in (b) (6) appeared to be relatively new; a woman inside the unit confirmed that the old unit had been removed and the unit in which she resides is new.

At 1229 hours on April 29 I called Don Strunk with LC and informed him that (b) (6) had dumped 3 loads at the Rattlesnake Road transfer station. Mr. Strunk said that the trailer receiving the debris at that transfer station may not have been dumped into the larger landfill and that he would attempt to intercept it prior to dumping.

At 1245 hours on April 29 we returned to the demolition site at Space #31 at 85961 Edenvale Rd. Mike Amelung (Pacific Environmental Group) and Mr. Goodell were present onsite. Ms. Wagstaff discussed details of the proposed abatement with Mr. Amelung while Ms. Eagleson and I discussed the incident with Mr. Goodell. We offered Mr. Goodell a copy of Title 43 and explained the requirements as they relate to this demolition project, including surveys, asbestos work practices and procedures, and disposal requirements. We also explained that, in contrast to information the survey that was presented to LRAPA staff on April 25, samples analyzed by LRAPA indicated the presence of asbestos in at least two separate materials in the demolition site. We requested a copy of the survey and the contract for the work. Mr. Goodell explained that he understood the requirements but did not have a copy of either the survey or the contract. We advised him to provide a copy of both of these documents by the end of the day and also advised him to initiate abatement, through the use of a licensed asbestos contractor, of the demolition site, (b) (6) truck, and the contaminated trailer from the Lane County transfer site. Mr. Goodell faxed a copy of the original (true) survey from Lodge later on April 29 but did not include the contract. Mr. Goodell said he understood and would fax the documents on the same day and begin proper abatement as soon as possible. He also explained that he planned to rent out (b) (6) in the Riverwood Mobile Home Park, unless abatement was affordable. Mr. Amelung proposed to remove roofing, windows, debris, and exposed wooden areas of the floor. He also proposed to wipe down vinyl areas of the floor and clean debris from the ground surrounding the demolished home.

At approximately 1500 hours on April 29 I discussed the transfer of demolition debris to LC with Jeff Bishop, Waste Management Superintendent. He confirmed that LC was able to isolate the trailer receiving contaminated debris from (b) (6) loads. He promised to hold this trailer aside until proper abatement could take place.

At approximately 1550 hours on April 29 I called Eric Martenson with EPA to discuss details of the incident.

At 0703 hours on May 2 (b) (6) left a message explaining that Mr. Goodell plans to not pay for abatement of the demolition site, as he cannot afford the abatement cost.

At 0835 hours on May 2 I spoke with Mr. Goodell over the phone. He admitted that he had falsified the original asbestos survey to reduce his costs for demolition and disposal of the mobile home. He also claimed to have no money to hire a licensed abatement company to properly remove and dispose of contaminated materials, nor did he claim to have assets available to sell in an effort to acquire the necessary funding. I explained that the demolition site at Space #31, (b) (6) truck, and the Rattlesnake Road transfer site dumpster must be abated—but in the meantime they must be wetted and contained to prevent additional exposure to those in the vicinity. I advised him to wet and contain the

the demolition site and (b) (6) truck by the end of the day. He agreed to contain these contaminated materials.

At 0900 hours on May 2 (b) (6) called me to discuss options for removing contaminated materials from his truck, as he claimed to require the use of his truck to conduct his business and earn his income. He requested to transfer the contaminated debris in his truck back to the demolition site at Space #31 in the Bella Casa mobile home park. I explained that as it has been confirmed that the associated debris is contaminated with asbestos, LRAPA rules require that the material remain in place, undisturbed, until a licensed abatement contractor removes and disposes of them. I also advised him to wet and cover the materials until abatement occurs. He claimed that PEG had visited his home and had covered the materials with plastic sheeting.

At 0919 hours on May 2 I called (b) (6) to discuss her concerns. She also is very concerned for the health of the occupants of her mobile home park. She claimed to have a copy of the contract between (b) (6) and Mr. Goodell. She emailed me a copy of this contract at 0939 hours on the same day.

At approximately 1100 hours on May 2 I called Keith Hendrix with the Lane County Landfill to discuss the contaminated trailer at the Rattlesnake Road transfer station. He explained that the 53-foot long trailer is contained and parked at the landfill until abatement can take place. I explained that Mr. Goodell may not have the required money to fund the abatement of the trailer. Mr. Hendrix said he would ensure the trailer is contained and would notify LRAPA before abatement takes place so photographs may be taken for documentation. Mr. Hendrix called back at 12135 hours on the same day to state his preference for using the same abatement company for all three locations (demolition site, (b) (6) truck, and the LC trailer). I concurred but explained that there may be a delay before the other two sites are funded for abatement.

At 1213 hours I called and left a message with (b) (6) to inquire about his involvement with the demolition site. I informed him that several materials from the site contained asbestos, and materials sourced from the area must be contained and properly abated.

At 14:50 hours on May 2 Ms. Eagleson and I reinspected the materials in (b) (6) truck at his home in Cottage Grove. The load was mostly contained within plastic sheeting, although a moderately small area on one side of the truck was not contained in plastic. Ms. Eagleson and I advised that he cover the remaining debris with sheeting until abatement occurs. (b) (6) communicated that he was unhappy that the abatement costs for his truck would fall upon him, as Mr. Goodell claimed to not have funding to hire an abatement contractor.

At 1520 hours Ms. Eagleson and I reinspected the demolition site at Space #31 in the Bella Casa mobile home park. The site had not been covered/contained in any way. We posted the perimeter of the mobile home with asbestos tape.

At 0850 hours on May 3 (b) (6) called to inform me that the demolition site at Space #31 had not been covered by Mr. Goodell. She also claimed to have been watering it occasionally to prevent asbestos fibers from becoming airborne.

At 1435 hours on May 3 I called Keith Hendrix with the Lane County Landfill. He explained that LC does maintain records of the addresses of the source of asbestos related debris; he said that they do not maintain records of conventional trash.